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18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**

20 In re TEZOS SECURITIES LITIGATION

21 This document relates to:

22 ALL ACTIONS

23 Master File No. 17-cv-06779-RS

24 Class Action

25 Judge: Hon. Richard Seeborg

26 **STIPULATION AND [PROPOSED]**
27 **ORDER ADDING NEW PLAINTIFFS**

1 WHEREAS, on April 3, 2018, Arman Anvari filed an Amended Consolidated Complaint
 2 (ECF No. 108) (the “Complaint”) against Dynamic Ledger Solutions, Inc. (“DLS”), Tezos Stiftung
 3 (“Tezos Foundation”), Kathleen Breitman, Arthur Breitman, Timothy Cook Draper (“Draper”),
 4 Draper Associates V Crypto LLC (“Draper Associates Crypto”) and Bitcoin Suisse AG (“Bitcoin
 5 Suisse”);

6 WHEREAS, on August 7, 2018 and August 31, 2018, the Court issued orders (ECF Nos.
 7 148 and 163) granting the motions to dismiss the Complaint filed by Draper, Draper Associates
 8 Crypto, and Bitcoin Suisse;

9 WHEREAS, on September 14, 2018, DLS, the Tezos Foundation, Kathleen Breitman, and
 10 Arthur Breitman (collectively “Defendants”) filed answers (ECF Nos. 168-171) to the Complaint;

11 WHEREAS, on November 21, 2018, the Court entered a stipulation adding Pumaro LLC as
 12 a named plaintiff to the Complaint (ECF No. 183);

13 WHEREAS, on January 7, 2019, the Court entered a stipulation adding Artiom Frunze as a
 14 named plaintiff to the Complaint (ECF No. 186);

15 WHEREAS, on April 8, 2019, the Court ordered Anvari withdrawn as Lead Plaintiff, and
 16 appointed Trigon Trading Pty. Ltd. (“Trigon”) as Lead Plaintiff (ECF No. 213);

17 WHEREAS, Lead Plaintiff Trigon and Defendants have agreed that additional named
 18 plaintiffs may be added to the Complaint without the need to file an amended pleading or amended
 19 answers by Defendants;

20 IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel on behalf of
 21 Lead Plaintiff Trigon and Defendants that:

22 (a) The Complaint (ECF No. 108, as amended by ECF Nos. 183, 186, and 213) is amended
 23 to add Lead Plaintiff Trigon and the following allegation as paragraph 14c:

24 Trigon Trading Pty. Ltd. (“Trigon”) is an Australian proprietary
 25 company which invested 18.9999 Bitcoin in the Tezos ICO on or
 26 around July 3, 2017. Trigon was promised delivery of 109,249.42
 27 Tezos tokens upon the conclusion of the Tezos ICO and the launch of
 28 the Tezos network. Trigon sold its Tezos tokens at a loss in early
 December 2018.

1 (b) Hayden Hsiung is added as an additional plaintiff and the following allegation is added
2 to the Complaint as paragraph 14d:

3 Plaintiff Hayden Hsiung is a U.S. citizen who invested 0.5 Bitcoin in
4 the Tezos ICO on July 1, 2017.

5 (c) Gijs Matser is added as an additional plaintiff and the following allegation is added to the
6 Complaint as paragraph 14e:

7 Plaintiff Gijs Matser is a citizen of the Netherlands who invested 31.2
8 Ethereum in the Tezos ICO on July 3, 2017.

9 (d) Defendants, and each of them, answer paragraph 14c as follows:

10 Defendants are without sufficient knowledge or information to form a
11 belief as to the truth of the allegations in paragraph 14c pertaining to
12 Trigon Trading Pty. Ltd.'s alleged contribution to the Fundraiser, and
13 on that basis deny them. Except as expressly admitted, Defendants
14 deny each and every remaining allegation of paragraph 14c.

15 (e) Defendants, and each of them, answer paragraph 14d as follows:

16 Defendants are without sufficient knowledge or information to form a
17 belief as to the truth of the allegations in paragraph 14d pertaining to
18 Hayden Hsiung's alleged contribution to the Fundraiser, and on that basis
19 deny them. Except as expressly admitted, Defendants deny each and
20 every remaining allegation of paragraph 14d.

21 (f) Defendants, and each of them, answer paragraph 14e as follows:

22 Defendants are without sufficient knowledge or information to form a
23 belief as to the truth of the allegations in paragraph 14e pertaining to
24 Gijs Matser's alleged contribution to the Fundraiser, and on that basis
25 deny them. Except as expressly admitted, Defendants deny each and
26 every remaining allegation of paragraph 14e.

27 Stipulated and agreed to by:

28 June 21, 2019

/s/ Jacob A. Walker

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12 *Frunze, Hayden Hsiung, and Gijs Matser*

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27 *Attorneys for Tezos Stiftung*
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1 SO ORDERED.
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June __, 2019

The Hon. Richard Seeborg
United States District Judge

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